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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KOFI SARFO,
ROSE SARFO

Defendants.

Case No. 2:23-cr-0132-APG-EJY

**JOINT STIPULATION TO EXTEND
TIME TO FILE OBJECTIONS
PURSUANT TO LOCAL RULE
LR IB 3-1**

[FIRST REQUEST]

Pursuant to Federal Rule of Criminal Practice 45(b) and the Court's Local Rule of Criminal Practice 45-1, the parties hereby stipulate, subject to the Court's approval, to permit Defendants to and until October 18, 2024, to file an Objection to the United States Magistrate Judge's ("USMJ") decision denying Rose Sarfo's motion to suppress (which was joined by her husband, Dr. Kofi Sarfo).¹ The USMJ made an oral pronouncement on September 11, 2024

¹ ECF Nos. 68 and 69.

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denying the motion and joinder and the Court’s “Minutes of Proceedings” issued that same day state that “[t]he transcript of these proceedings will serve as the Court’s Order.” ECF No. 112. The transcript of the September 11, 2024 hearing was filed on September 17, 2024. ECF No. 118. Accordingly, by operation of the Court’s Local Rule LR IB 3-1(a), which requires the filing of an Objection within 14-days after “service of the order,” Defendants’ Objection in this case would be due on October 1, 2024.

For the reasons set forth below, good cause supports the requested extension. Specifically, counsel for the respective parties are expected to have an in-person meeting in Washington, D.C. on October 10, 2024, for the purpose of exploring potential resolution of this case. In light of this, counsel for Defendants have requested that government counsel agree to extend the time for their clients to file an Objection to the USMJ’s order which may be rendered moot if in fact the parties are able to reach a resolution. Given that undersigned counsel for Defendants are retained in this matter, extending the time for filing an Objection in this case will result in a significant cost saving for the Sarfos and will allow the parties to focus their efforts, at this juncture, at reaching a potential resolution.

Should the parties fail to reach a resolution of this case, this Stipulation to extend the time for filing an Objection will not impact the trial currently scheduled for December 2, 2024 (ECF No. 93). Counsel for the parties agree that this Stipulation is warranted and promotes the ends of justice.

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1 For the reasons set forth in this joint Stipulation, the parties respectfully request that the
2 Court approve this Stipulation.

3 DATED this 30th day of September 2024.

4 Respectfully submitted,

5 /s/ Kyle A. Crawford

/s/ Kathleen Bliss

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7 Kyle A. Crawford, Esq.
8 Jessica Oliva, Esq.
9 Andrew Tyler, Esq.
10 *Counsel for the United States*

11 Kathleen Bliss, Esq.
12 *Counsel for Dr. Kofi Sarfo*

13 /s/ Paul S. Padda

14 Paul S. Padda, Esq.
15 *Counsel for Rose Sarfo*

16 **IT IS SO ORDERED:**

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18 **UNITED STATES DISTRICT JUDGE**

19 **DATED:** October 1, 2024
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